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8 JM-5630_____

9 UNITED STATES BANKRUPTCY COURT
10 DISTRICT OF NEW JERSEY
11

12 In re:)
13) Case No. 08-27507(RG)
14)
15 EDWARD MCCOUCH) Chapter 13
16 BONNIE JEAN MCCOUCH)
17) Hearing date: 11-19-08
18)
19) OBJECTION TO CONFIRMATION
20)
21 _____)

22 Ford Motor Credit Company, a secured creditor of the debtors,
23 objects to the debtors' plan for the following reasons:

24 a. The plan does not deal with/does not mention Ford. Ford
25 objects, on the basis that if the plan were to complete
26 early, and completes before the loan maturity date of the
27 debtors' secured loan with Ford, there is a risk that the
28 debtors will take the position that their loan with Ford has
29 been discharged under §1325. To resolve this issue, part 3(d)
of the plan should be revised to state that the claim of Ford
Credit is unaffected by the plan and will not be discharged
upon completion of the plan.

30 /s/ Laura J. Neville
31 Laura J. Neville, attorney
32 for Ford Motor Credit Company

33 Dated: 10-23-08